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11
12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 THE UNITED STATES OF AMERICA,

15
16 Plaintiff,

17 -vs-

18 JAN ROUVEN FUECHTENER,

19 Defendant.
20

Case No.: 2:16-cr100-GMN-CWH

**MOTION TO CONTINUE TRIAL AND
TO SET A STATUS CONFERENCE**

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22 **MOTION TO CONTINUE TRIAL DATE**
23 **AND TO SET A STATUS CONFERENCE**
24

25 COMES NOW Defendant, JAN ROUVEN FUECHTENER, by and through his attorneys of
26 record, JESS R. MARCHESE, ESQ., of the law firm of MARCHESE LAW OFFICES, PC, and
27 MICHAEL SANFT of the law firm of SANFT LAW GROUP, hereby move this Honorable Court for
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1 an order setting a status conference for the purpose of continuing the trial date.

2 This Motion is made in good faith and not for purposes of delay.

3 DATED this 5th day of June, 2016.

4
5 MARCHESI LAW OFFICES, PC

6 By: /s/
7 JESS R. MARCHESI, ESQ.
8 Nevada Bar No.: 8175
9 601 S. Las Vegas Blvd.
10 Las Vegas, Nevada 89101
11 (702) 385-5377
12 Attorney for Defendant:
13 JAN ROUVEN FUECHTENER

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 Defendant Jan Rouven Fuechtener has a trial date of June 20, 2016. This trial date was reset
16 (#40) over the defense's objection (#36) after the government filed a motion to continue the original
17 trial date of June 6th, 2016 (#30).

18 Mr. Fuechtener is unable to proceed on the June 20th trial date as one of his witnesses, Larry
19 Smith, is unavailable the week of the currently scheduled trial.

20 Based upon the aforementioned facts, counsel for the defense requests a status conference in
21 order to reset the trial date as both the undersigned and Mr. Sanft have busy trial schedules and do not
22 want to create another conflict with a trial date.

23 **CONCLUSION**

24 For the foregoing reasons, counsel for the Defendant, JAN ROUVEN FUECHTENER,
25 respectfully request that this Honorable Court set a status conference for the purpose of resetting the
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1 trial date.

2 DATED this 5th day of June, 2016.

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4 RESPECTFULLY SUBMITTED:
5 MARCHESE LAW OFFICES, PC

6 By: /s/
7 JESS R. MARCHESE, ESQ.
8 Nevada Bar No.: 8175
9 601 S. Las Vegas Blvd.
10 Las Vegas, Nevada 89101
11 (702) 385-5377
12 Attorney for Defendant

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14 **CERTIFICATE OF SERVICE**

15 I hereby certify that a true and correct copy of the foregoing was motion was filed on June 5,
16 2016 via the Southern District of Nevada ECF system to the all registered following recipients:

17 Ms. Elham "Ellie" Roohani , Esq.
18 Ms. Cristina Silva, Esq.
19 United States Attorney's Office

20 /s/
21 Employee of Jess R. Marchese, Esq.